

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- RENEWAL

PERMITTEE

TSC Pyroferric International, Inc.
Attn: Bill Reichel
39105 North Magnetix Boulevard
Wadsworth, Illinois 60083

<u>Application No.:</u> 93060092	<u>I.D. No.:</u> 035020AAK
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 12, 2010
<u>Subject:</u> Iron Powder Core Manufacturing Processes	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 507 East Madison Street, Toledo, Cumberland County	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Eight (8) Mixers and Three (3) Electric Powder Drying Ovens for Mixing (Powder, Acetone, and Phosphatizing Solution);
Chopping, Sifting, and Lubricating; Controlled by a Baghouse;
Three (3) 75,000 Btu/hr and One (1) 350,000 Btu/hr Natural Gas-Fired Curing Ovens;
Two (2) Coating Booths;
Core Grinding Operations with Coolant Usage (a mixture of aliphatic hydrocarbon and a metalworking fluid which is primarily oil);
Sludge Drying Oven;
Rising/Air Drying Process;
Two (2) 2,500 gallon Acetone Storage Tanks;
Twelve (12) Gas Space Heaters (6 @ 75,000 Btu/hr & 6 @ 150,000 Btu/hr); and
Two (2) Air Make-up Gas Furnaces (1 @ 750 Btu/hr & 1 @ 800,000 Btu/hr)

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission

Standards for Hazardous Air Pollutants (NESHAP) for Surface
Coating Of Miscellaneous Metal Parts And Products, 40 CFR 63
Subpart Mmmm.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
- 2a. The sludge dryer is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Mercury, 40 CFR 61 Subparts A and E. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 61.52(b), emissions to the atmosphere from sludge incineration plants, sludge drying plants, or a combination of these that process wastewater treatment plant sludges shall not exceed 3.2 kg (7.1 lb) of mercury per 24-hour period.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
4. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of

sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

- 5a. Pursuant to 35 Ill. Adm. Code 215.204(j)(4), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

Miscellaneous Metal Parts and Products Coating		kg/l	lb/gal
i.	Clear Coating	0.52	(4.3)
ii.	Air Dried Coating	0.42	(3.5)
iii.	Extreme Performance Coating	0.42	(3.5)
iv.	All other coatings	0.36	(3.0)

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 6a. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the iron powder cores coating operations at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paint Stripping And Miscellaneous Surface Coating Operations At Area Sources, 40 CFR 63 Subpart HHHHHH, because the source is not involved in the spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- c. This permit is issued based on the coating booths and core grinding operations at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subpart XXXXXX, because the source does not use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and

nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens.

- 7a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. Pursuant to 35 Ill. Adm. Code 212.681(a), 35 Ill. Adm. Code 212.321 and 212.322 shall not apply to grinding, which shall be subject to 35 Ill. Adm. Code Part 212 Subpart K.
- 8a. Pursuant to 35 Ill. Adm. Code 215.206(b), the limitations of 35 Ill. Adm. Code 215 Subpart F shall not apply to touch-up and repair coatings used by a coating source described in 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j); provided that the source-wide volume of such coatings does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling twelve-month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 215.206(c).
- b. Pursuant to 35 Ill. Adm. Code 215.206(d), "touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 215.206, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.
- c. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill. Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.
- 9a. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the baghouse associated with the chopping, sifting, and lubricating operations such that the baghouse is kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

- c. The curing ovens, sludge dryer, space heaters, and air make-up air furnaces shall only operated with natural gas as the fuel. The use of any other fuel in the curing ovens, sludge dryer, space heaters, or the air make-up air furnaces requires that the Permittee first obtain either a revision of this permit or a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

- 10a. Emissions and operation from coolant usage in the core grinding operation shall not exceed the following limits:

<u>Operation</u>	<u>Operating Hours</u> (Hour/Year)	<u>VOM Emissions</u>	
		(Ton/Month)	(Ton/Year)
Coolant Usage	8,760	1.3	10.0

These limits are based on maximum hourly usage of coolant at the maximum operating hours. The coolant is comprised of two primary parts: an aliphatic hydrocarbon and a metal-working fluid which is primarily oil. For the purpose of this permit it shall be presumed that all the VOM in coolant which is purchased is emitted.

- b. This permit is issued based on negligible emissions of PM from the core grinding operation. For this purpose, emissions of PM from the core grinding operation shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year per unit.
- c. Emissions and operation from the two coating booths shall not exceed the following limits:

<u>Pollutant</u>	<u>Paint & Solvent Usage*</u>		<u>Material</u> <u>Content</u> (lbs/gal)	<u>Emission</u>	
	(gal/month)	(gal/year)		(lbs/month)	(tons/year)
VOM	686	6,857	3.50	2,400	12.0
HAPs			2.48	1,700	8.5

These limits are based on the maximum coating usage, the allowable VOM content of the coating pursuant to 215.204(j) and the maximum HAP content. For the purpose of this permit it shall be presumed that all the VOM and HAPs in the paint (including all additional solvents) which are purchased are emitted

* Clean-up solvent is also used as a reducer for the paint. The total VOM emissions (lb/month and tons/year) also include emissions from the clean-up solvent.

- d. Emissions and operation of the Iron Powder process operation shall not exceed the following limits:

<u>Item Of Equipment</u>	<u>Operating Hours (Hour/Yr)</u>	<u>Iron Powder Usage (Tons/Month)</u>	<u>Particulate Emissions (lb/Month)</u>	<u>Emissions (Ton/Yr)</u>
Iron Powder Mixing	8,760	100	100.0	0.5
Iron Powder Preparation (Chopping, Sifting and Lubricating)	8,760	100	100.0	0.5

These limits are based on the maximum particulate matter emissions resulting from the maximum iron powder usage.

- e. Emissions and operation of natural gas combustion equipment shall not exceed the following limits:

<u>Pollutant</u>	<u>Natural Gas Usage (mmscf/hr)</u>	<u>Natural Gas Usage (mmscf/year)</u>	<u>Emission Factors (lbs/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>Emissions (Tons/yr)</u>
CO	3.20	32.00	84.0	0.13	1.34
NOx			100.0	0.16	1.60
PM			7.60	0.01	0.12
SO ₂			0.60	0.01	0.01
VOM			5.50	0.01	0.09

These limits are based on the total maximum firing rate of the natural gas-fired units combined, the maximum operating hours (8,760 hr/yr), and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- f. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.20 tons/month and 22.0 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Surface Coating Of Miscellaneous Metal Parts And Products, 40 CFR 63 Subpart Mmmm.
- g. Compliance with annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 11a. Pursuant to 40 CFR 61.13(b), the Illinois EPA or USEPA may require an owner or operator to test emissions from the source at any other time when the action is authorized by section 114 of the Clean Air Act.
- b. Pursuant to 40 CFR 61.13(c), the owner or operator shall notify the Illinois EPA or USEPA of the emission test at least 30 days before the emission test to allow the Illinois EPA or USEPA the opportunity to have an observer present during the test.

- c. Pursuant to 40 CFR 61.13(d), if required to do emission testing, the owner or operator of each new source and, at the request of the Illinois EPA or USEPA, the owner or operator of each existing source shall provide emission testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to each source.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).
 - iv. Utilities for sampling and testing equipment.
 - v. Any other facilities that the Illinois EPA or USEPA needs to safely and properly test a source.
- d. Pursuant to 40 CFR 61.13(e), each emission test shall be conducted under such conditions as the Illinois EPA or USEPA shall specify based on design and operational characteristics of the source.
- e. Pursuant to 40 CFR 61.13(f), unless otherwise specified in an applicable subpart of 40 CFR Part 61, samples shall be analyzed and emissions determined within 30 days after each emission test has been completed. The owner or operator shall report the determinations of the emission test to the Illinois EPA or USEPA by a registered letter sent before the close of business on the 31st day following the completion of the emission test.
- 12a. Pursuant to 40 CFR 61.53(d)(1), unless a waiver of emission testing is obtained under 40 CFR 61.13, each owner or operator of a source subject to the standard in 40 CFR 61.52(b) shall test emissions from that source. Such tests shall be conducted in accordance with the procedures set forth either in 40 CFR 61.53(d) or in 40 CFR 61.54.
- b. Pursuant to 40 CFR 61.53(d)(2), Method 101A in appendix B to 40 CFR Part 61 shall be used to test emissions as follows:
 - i. The test shall be performed within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date.
 - ii. The test shall be performed within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.
- c. Pursuant to 40 CFR 61.53(d)(3), the Illinois EPA or USEPA shall be notified at least 30 days prior to an emission test, so that he may at his option observe the test.
- d. Pursuant to 40 CFR 61.53(d)(4), samples shall be taken over such a period or periods as are necessary to determine accurately the maximum

emissions which will occur in a 24-hour period. No changes shall be made in the operation which would potentially increase emissions above the level determined by the most recent stack test, until the new emission level has been estimated by calculation and the results reported to the Illinois EPA or USEPA.

- e. Pursuant to 40 CFR 61.53(d)(5), all samples shall be analyzed and mercury emissions shall be determined within 30 days after the stack test. Each determination shall be reported to the Illinois EPA or USEPA by a registered letter dispatched within 15 calendar days following the date such determination is completed.
- 13a. Pursuant to 40 CFR 61.54(a), as an alternative means for demonstrating compliance with 40 CFR 61.52(b), an owner or operator may use Method 105 of appendix B and the procedures specified in 40 CFR 61.54.
 - i. A sludge test shall be conducted within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date; or
 - ii. A sludge test shall be conducted within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.
- b. Pursuant to 40 CFR 61.54(b), the Illinois EPA or USEPA shall be notified at least 30 days prior to a sludge sampling test, so that he may at his option observe the test.
- c. Pursuant to 40 CFR 61.54(c), sludge shall be sampled according to 40 CFR 61.54(c)(1), sludge charging rate for the plant shall be determined according to 40 CFR 61.54(c)(2), and the sludge analysis shall be performed according to 40 CFR 61.54(c)(3).
 - i. The sludge shall be sampled according to Method 105—Determination of Mercury in Wastewater Treatment Plant Sewage Sludges. A total of three composite samples shall be obtained within an operating period of 24 hours. When the 24-hour operating period is not continuous, the total sampling period shall not exceed 72 hours after the first grab sample is obtained. Samples shall not be exposed to any condition that may result in mercury contamination or loss.
 - ii. The maximum 24-hour period sludge incineration or drying rate shall be determined by use of a flow rate measurement device that can measure the mass rate of sludge charged to the incinerator or dryer with an accuracy of ± 5 percent over its operating range. Other methods of measuring sludge mass charging rates may be used if they have received prior approval by the Illinois EPA or USEPA.

iii. The sampling, handling, preparation, and analysis of sludge samples shall be accomplished according to Method 105 in appendix B of this part.

- d. Pursuant to 40 CFR 61.54(d), the mercury emissions shall be determined by use of the following equation.

$$E_{Hg} = \frac{MQ F_{sm(avg)}}{1000}$$

where:

E_{Hg} = Mercury emissions, g/day.

M = Mercury concentration of sludge on a dry solids basis, $\mu\text{g/g}$.

Q = Sludge changing rate, kg/day.

F_{sm} = Weight fraction of solids in the collected sludge after mixing.

1000 = Conversion factor, $\text{kg } \mu\text{g/g}^2$.

- e. Pursuant to 40 CFR 61.54(e), no changes in the operation of a plant shall be made after a sludge test has been conducted which would potentially increase emissions above the level determined by the most recent sludge test, until the new emission level has been estimated by calculation and the results reported to the Illinois EPA or USEPA.
- f. Pursuant to 40 CFR 61.54(f), all sludge samples shall be analyzed for mercury content within 30 days after the sludge sample is collected. Each determination shall be reported to the Illinois EPA or USEPA by a registered letter dispatched within 15 calendar days following the date such determination is completed.
- 14a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of

air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 15 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 15a. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.
- b. Pursuant to 35 Ill. Adm. Code 215.208(b), transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA.
- 16. Pursuant to 40 CFR 61.55(a), all the sources for which mercury emissions exceed 1.6 kg (3.5 lb) per 24-hour period, demonstrated either by stack sampling according to 40 CFR 61.53 or sludge sampling according to 40 CFR 61.54, shall monitor mercury emissions at intervals of at least once per year by use of Method 105 of appendix B or the procedures specified in 40 CFR 61.53 (d) (2) and (4). The results of monitoring shall be reported and retained according to 40 CFR 61.53(d)(5) and (6) or 40 CFR 61.54(f) and (g).
- 17. Pursuant to 40 CFR 61.13(g), the owner or operator shall retain at the source and make available, upon request, for inspection by the Illinois EPA or USEPA, for a minimum of 2 years, records of emission test

results and other data needed to determine emissions.

- 18a. Pursuant to 40 CFR 61.53(d)(6), records of emission test results and other data needed to determine total emissions shall be retained at the source and shall be made available, for inspection by the Illinois EPA or USEPA, for a minimum of 2 years.
- b. Pursuant to 40 CFR 61.54(g), records of sludge sampling, charging rate determination and other data needed to determine mercury content of wastewater treatment plant sludges shall be retained at the source and made available, for inspection by the Illinois EPA or USEPA, for a minimum of 2 years.
19. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 20a. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall:
 - i. Collect and record the name, identification number, and volume of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;

- ii. Perform calculations on a daily basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;
 - iii. Perform calculations on a monthly basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling twelve-month period;
 - iv. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to 35 Ill. Adm. Code 215.206(b) on or before January 31 of the following year;
 - v. Maintain at the source for a minimum of three years all records required to be kept under this 35 Ill. Adm. Code 215.206(c) and make such records available to the Agency upon request.
- 21a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
- i. Records addressing use of good operating practices for the baghouse associated with the chopping, sifting, and lubricating operations:
 - A. Records for periodic inspection of the baghouse associated with the chopping, sifting, and lubricating operations with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Coolant Usage (tons/month and tons/year);
 - iii. Paint Usage (gallon/month and gallons/year);
 - iii. Clean-up Solvents Usage (gallon/month and gallon/year);
 - iv. VOM content of paints and clean-up solvents used (% by weight);
 - v. HAP content of paints and clean-up solvents used (% by weight);
 - vi. Density of paints and clean-up solvents used (lb/gallon);
 - viii. Iron powder usage rates (tons/month and tons/year);
 - ix. Natural gas usage (mmscf/month and mmscf/year); and
 - x. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPS from the source with supporting calculations (tons/month and tons/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 22. Pursuant to 35 Ill. Adm. Code 215.206(c)(6), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/year (55 gal/year) for any rolling twelve-month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance.
- 23a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:
 - Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - Compliance Section (#40)
 - P.O. Box 19276
 - Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

- Illinois Environmental Protection Agency
- Division of Air Pollution Control
- 2009 Mall Street
- Collinsville, Illinois 62234

Page 14

If you have any questions on this, please call German Barria at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed:_____

REP:GB:

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Core Grinding and Coolant Usage			0.44		10.00		
Iron Powder Cores Coating Booths					12.00	8.5	8.5
Iron Powder Mixing			0.50				
Iron Powder Preparation (Chopping, Sifting, and Lubricating)			0.50				
Natural Gas Combustion	<u>1.34</u>	<u>1.60</u>	<u>0.12</u>	<u>0.01</u>	<u>0.09</u>	<u>---</u>	<u>---</u>
Totals	1.34	1.60	1.56	0.01	22.09	9.0	22.0

GB: